UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	Crim. No. 16cr10168
v.	)	
	)	
VICTOR FLORENTINO	)	

SENTENCING MEMORANDUM

Defendant Victor Florentino does not dispute that the applicable Sentencing Guidelines set an advisory range of 57-60 months. In his recently-filed sentencing memorandum, Defendant seeks a sentence of 12 months and one day. While the government agrees that, in this case, a sentence below the applicable Guideline range is warranted, Defendant's recommended sentence does not reflect the seriousness of the crime. The government recommends a sentence of 36 months' incarceration to be followed by 3 years of supervised release, no fine (given Defendant's financial resources) and a $100 mandatory assessment.

As set forth in the PSR, Defendant was actively involved in illegal firearms trafficking in the Boston area, and brokered the sale of three handguns to a cooperating witness – one of which had an obliterated serial number (thus making it more difficult to trace by authorities). In brokering three separate firearms sales, Defendant was able to access at least two separate sources for illegal firearms in a relatively short period of time – less than one month. This type of illegal, street-level, gun trafficking presents a significant danger to the community as it provides the weapons used throughout the spectrum of criminal activity in the Boston area, including violent crimes and drug trafficking. Defendant's access to multiple firearms sources, and his ability to arrange for three firearms transactions in less than one month, supports that

Defendant had substantial ties to illegal firearm trafficking. Defendant knowingly and actively participated in this dangerous conduct for his own personal, financial benefit. Thus, Defendant repeatedly placed the community danger through his actions for nothing more than money.

Defendant's criminal record is not as extensive as others that appear before the Court, but he has had been involved with the criminal justice system since an early age, and his crimes have involved both violence and drug trafficking. Defendant had opportunities to change his lifestyle based on his involvement with the criminal justice system. He chose to continue to commit crimes, and, in this case, to arm other criminals.

In light of the facts of the case, particularly the seriousness of illegal firearms trafficking in the Boston area and that Defendant was tied to multiple illegal handgun transactions, a sentence of 3 years' incarceration, followed by 3 years of supervised release, is warranted under all the factors set forth in 18 U.S.C. Section 3553.

Respectfully submitted,

WILLIAM D. WEINREB
Acting United States Attorney

By: ***/s/ Michael J. Crowley***
MICHAEL J. CROWLEY
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I, Michael J. Crowley, Assistant United States Attorney, do hereby certify that this document, filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on this date.

/s/ *Michael J. Crowley*
MICHAEL J. CROWLEY
Assistant U.S. Attorney